

To: Siciliano, CarolAnn[Siciliano.CarolAnn@epa.gov]; Koslow, Karin[Koslow.Karin@epa.gov]
Cc: Packard, Elise[Packard.Elise@epa.gov]
From: Minoli, Kevin
Sent: Tue 4/25/2017 7:15:10 PM
Subject: Re: Scientific Integrity: current draft

Hi Carol Ann- Thank you for forwarding. I realize that I may be too late, but I feel it is important to pass along my concerns.

Ex. 5 - Deliberative Process

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Thanks! Kevin

Kevin S. Minoli
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On Apr 25, 2017, at 12:02 PM, Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov> wrote:

MEMORANDUM

SUBJECT: Office of Inspector General Hotline Complaint 2017-0182

FROM: Francesca Grifo

EPA Scientific Integrity Official

TO: Arthur Elkins

EPA Inspector General

You recently referred OIG General Hotline Complaint 2017-0182, an allegation of a violation of the EPA Scientific Integrity Policy by the Administrator, to me^[1]. I in turn have conducted an inquiry in accordance with our procedures for resolving allegations of loss of scientific integrity^[2] and our Coordination Procedures between the Scientific Integrity Official and the Office of the Inspector General^[3].

In this case, the Administrator was asked during a television interview, “Do you believe....” In response, the Administrator expressed his [scientific] opinion regarding contributors to global warming and called for more debate, review, and analysis.

My review focused on the following text included in the EPA Scientific Integrity Policy^[4]:

When an Agency employee substantively engaged in the science informing an Agency policy decision disagrees with the scientific data, scientific interpretations, or scientific conclusions that will be relied upon for said Agency decision, the employee is encouraged to express that opinion...

[CAS suggestion because of “substantively engaged” clause in quotation above:

Science is part of EPA’s work. Many people, including managers and the Administrator, are substantively engaged in science that may someday inform policy decisions.] Expressing an opinion about science is not a violation of the EPA Scientific Integrity Policy. Indeed, the Scientific Integrity Policy – in the spirit of promoting vigorous debate and inquiry -- specifically encourages employees to express disagreement with scientific data, scientific interpretations, or scientific conclusions. Furthermore, the Administrator’s response was not associated with a policy decision, and the expression of his [scientific] opinion did not suppress or alter Agency scientific findings. Therefore, I do not find that the Administrator’s statement violated the Policy.

The Scientific Integrity Policy applies to all EPA employees, contractors, grantees, collaborators and student volunteers, including political appointees. The freedom to express one’s scientific opinion is fundamental to EPA’s Scientific Integrity Policy even (and especially) when that point of view might be controversial.

Thank you for your referral of this matter. I hope this information is useful as you move to conclude this matter.

Carol Ann Siciliano

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[1] <https://www.docdroid.net/HvDdJZs/sierra-club-scientific-integrity-complaint-3-14-17.pdf.html> (last visited 4/4/17)

[2] https://www.epa.gov/sites/production/files/2015-04/documents/annual_report_scientific_integrity_2014_final_pages.pdf (last visited 4/4/17)

[3] https://intranet.ord.epa.gov/sites/default/files/media/oig-scio_coordination_procedures_final.pdf (last visited 4/4/17)

[4] https://www.epa.gov/sites/production/files/2014-02/documents/scientific_integrity_policy_2012.pdf (last visited 4/4/17)